

EXHIBIT 2
DEFENDANT'S OBJECTIONS & COUNTERDESIGNATIONS TO PLAINTIFF'S
DEPOSITION DESIGNATIONS

1. Brian Belcher - 10/20/09

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
14:3	14:18	Not relevant		
15:6	18:4	Not relevant		
27:5	28:3	106	29:1	29:6
31:1	31:4	Lack of foundation; not relevant; leading		
39:23	39:24	Lack of foundation		
40:2		Lack of foundation		
43:19	44:4	106	44:5	45:13
45:14	45:17	Lack of foundation		
45:22	46:15	Lack of foundation		
46:16	46:24	Leading		
46:25	47:17	106	46:24	
49:5	49:6	Lack of foundation		
49:8		Lack of foundation		
51:1	51:7	106; lack of foundation	51:8	51:11
56:7	56:18	Lack of foundation		
61:6	62:10	Lack of foundation; leading		
62:12	62:18	Lack of foundation; leading		
62:20	62:25	Lack of foundation; leading		
69:12	70:2	Lack of foundation		
70:17	70:23	Not relevant		
71:5	71:14	Lack of foundation; not relevant; leading		
71:16	71:24	Not relevant; leading		
72:20	73:17	Lack of foundation; leading		
73:21		Leading; 106	74:3	74:15
83:19	83:25	Leading; lack of foundation; 106	79:25	80:13
86:6	87:15	Not relevant		
89:23	90:2	Lack of foundation; leading		
91:2	92:1	Lack of foundation; leading		
93:12	93:23	Lack of Foundation; not relevant		
93:7	93:10	Lack of foundation		

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95:7	95:13	Lack of foundation		
107:19	108:4	106	106:16	107:3
108:4	108:6	Lack of foundation; not relevant; 403 prejudicial		
111:3	111:8	Lack of foundation		
111:9	111:25	Lack of foundation		
112:3	112:4	Lack of foundation		
112:16	112:25	Lack of foundation; leading		
113:1	113:9	Leading		
113:13		Leading		
116:6	116:20	Leading		
117:9	117:20	Leading		
121:7	121:22	Lack of foundation; leading		
123:1	123:24	106	125:7	125:16
			126:6	126:10
130:13	131:6	Lack of foundation; not relevant		
131:7	131:11	Lack of foundation; not relevant		
131:12	131:17	Lack of foundation; not relevant		
131:19	132:6	403; relevant		

2. Richard Gardner - 1/13/10

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
140:18	142:22	Not relevant		
144:18	146:1	Not relevant		
147:5	149:12	Not relevant; lacks foundation; leading		
149:14	153:3	Not relevant; leading		
153:9	154:11	Not relevant; lack of foundation		
154:14	154:20	Lack of foundation; not relevant		
156:5	156:20	Lack of foundation; not relevant	157:5	157:16
164:15	164:20	Not relevant; leading		
164:22	166:17	Not relevant; leading		
170:4	170:8			
170:14	171:7	Not relevant; lack of foundation; 403, prejudicial, confuses issues		
171:16	172:5	Not relevant; lack of foundation; 403,		

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DEFENDANT'S OBJECTIONS & COUNTERDESIGNATIONS TO PLAINTIFF'S
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		prejudicial, confuses issues		
172:8	176:7			
177:3	179:11	Lack of foundation		
180:15	181:1	Not relevant		
183:11	185:17	Not relevant; 403, prejudicial, confuses issues; lack of foundation	185:22 191:19	190:3 193:6

3. Jeffrey Greene - 6/17/08

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
15:2	15:5	Not relevant		
15:18	18:15			
18:24	19:12	106	19:13	19:15
34:24	34:25	106	35:1	35:22
67:5	68:17	Lack of foundation; hearsay		
69:2	69:16	Lack of foundation; hearsay		
70:5	70:21	Lack of foundation; hearsay		
70:23	71:3	Lack of foundation; hearsay		
76:15	77:25	Not relevant; outside scope of 30(b)(6)		
78:12	78:23	Not relevant; outside scope of 30(b)(6)		
79:8	79:19	Not relevant; outside scope of 30(b)(6)		
88:15	89:9	Lack of foundation		
89:24	90:7	Lack of foundation		
90:18	91:6	Lack of foundation		
97:3	98:2	Not relevant		
99:14	101:5	Not relevant		
102:8	103:19	Not relevant; lack of foundation		
103:20	104:5	Lack of foundation; hearsay; not relevant		
104:20	105:19	Outside scope of 30(b)(6) ; lack of foundation, hearsay		
106:11	107:18	Outside scope of 30(b)(6) ; lack of foundation, hearsay		
108:12	109:23	Lack of foundation; hearsay		
111:9	112:5	Outside scope of 30(b)(6) ; lack of foundation,		

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DEFENDANT'S OBJECTIONS & COUNTERDESIGNATIONS TO PLAINTIFF'S
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		hearsay		
113:18	114:8	Lack of foundation		
114:23	115:7	Lack of foundation		
117:1	117:13	Lack of foundation; hearsay		
117:14	117:19	106	117:23	118:5
122:24	123:23	Lack of foundation; hearsay		
124:15	125:13	Outside scope of 30(b)(6) ; lack of foundation; hearsay		
125:14	127:4	Lack of foundation		
127:18	128:11	Lack of foundation		
131:1	131:7	Lack of foundation		
136:18	137:6	106	137:7	137:9
137:17	138:12	Lack of foundation		
139:5	139:15	Lack of foundation		
140:10	141:16			
141:22	143:16	106	144:2	144:15
143:22	144:1			
148:17	149:22	Lack of foundation		
150:23	152:25	106	153:1	153:11
155:18	156:6	Lack of foundation		
157:24	158:20	Lack of foundation		
163:16	163:25	Outside scope of 30(b)(6)		
167:1	170:19	Outside scope of 30(b)(6); lack of foundation; hearsay		
171:2	171:6	Lack of foundation		
172:13	172:15	Lack of foundation		
173:13	175:16	Lack of foundation		
177:21	177:25	Lack of foundation; leading		
180:22	181:24	Lack of foundation		
182:24	183:1	Leading		
185:24	186:17	Lack of foundation		
191:19	191:24	Lack of foundation		
193:23	194:5	Lack of foundation; not relevant		
194:14	195:24	Lack of foundation; not relevant		
197:8	199:19	Not relevant		

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201:11	203:16	Not relevant		
204:16	205:14	Not relevant		
206:1	206:4	Not relevant		
206:25	207:23	Lack of foundation; not relevant		
207:24	208:10	Lack of foundation; not relevant		
208:22	209:24	Outside scope of 30(b)(6) ; lack of foundation; relevant		
210:23	212:25	Outside scope of 30(b)(6) ; lack of foundation; hearsay		
213:13	214:7	Not relevant		
216:1	216:9	Not relevant		
217:10	219:2	Not relevant		
219:3	219:17	Outside scope of 30(b)(6); not relevant		
219:18	220:9	Not relevant		
222:7	222:13	Not relevant		
222:14	224:4	Not relevant		
224:19	225:12	Not relevant		
227:8	232:2			
229:16	232:2	Not relevant		
232:6	233:12	Not relevant; 106	233:13	233:25
234:1	234:19	Not relevant		
237:14	238:6	Not relevant		
238:14	239:21	Outside scope of 30(b)(6) ; lack of foundation; not relevant		
242:8	243:2	106	241:13	242:7
245:2	245:11	Not relevant		
250:1	251:20	Not relevant		
252:9	253:23	Not relevant		
254:19	255:14	Not relevant		
256:13	260:25	Not relevant		
267:5	267:24	Not relevant		
268:11	269:15	Not relevant		

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DEFENDANT'S OBJECTIONS & COUNTERDESIGNATIONS TO PLAINTIFF'S
DEPOSITION DESIGNATIONS

4. Jeffrey Greene - 12/13/09

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
19:13	22:19	Not relevant		
24:25	25:11	Not relevant; 106	25:12	27:12
			27:20	28:24
			33:23	35:9
34:18	34:20			
51:25	53:5	Not relevant		
53:10	54:4	Lack of foundation; not relevant		
54:5	54:14	Not relevant; 106	54:15	54:21
54:22	56:4	Not relevant; 106	56:5	57:7
59:3	59:21	Lack of foundation		
60:19	61:10	Lack of foundation		
61:13	61:17			
66:22	68:6	Lack of foundation		
76:11	78:20	Not relevant; 403; 106	78:21	79:3
79:4	79:21	Not relevant; 403		
79:24	82:10	Not relevant; 403		
82:15	84:17	Not relevant; 403		
85:2	85:12	Lack of foundation; not relevant	86:7	86:18
85:17	85:25	Lack of foundation; not relevant	86:1	86:18
86:19	87:15	Not relevant; 403		
88:16	90:9	Not relevant; 403; 106	90:10	90:11
95:22	96:9	Not relevant; 403		
100:10	102:17	Not relevant; 403		
104:22	105:4	106	106:7	106:20
107:20	108:1	Form of question, mischaracterizes the document		
108:2	108:25	Lack of foundation; form of question, witness improperly asked to testify on behalf of Gamber as a corporate entity		
114:23	115:23	Not relevant		
116:11	116:23	Not relevant; 106	119:2	119:17

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124:8	125:10	Not relevant		
128:3	129:5	Lack of foundation; hearsay; form of question, mischaracterizes the document		
129:10	130:9	Lack of foundation; hearsay; form of question, mischaracterizes the document		
130:10	132:12	Not relevant; subject matter excluded from trial pursuant to stipulation of parties		

5. Jennifer Guerndt - 8/26/09

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
9:9	9:18	Not Relevant; 106	9:5	9:8
14:19	15:1			
28:6	28:20	106	28:21	29:15
29:16	29:23	106	29:24	30:17
31:16	31:18	106	31:12	31:15
38:21	39:1	106	43:1	43:6
46:1	46:20	106	35:20	36:12
69:3	69:6	Outside the Scope/106	68:20	69:2
74:5	74:7	Not Relevant, Lack of Foundation; incomplete		
77:3	77:21	Not Relevant/Lack of Foundation		
83:3	84:10	Lack of Foundation/Calls for Speculation, 106	84:1	84:6
113:17	113:20	Lack of foundation; 106	112:18	112:25
112:23	112:25	Lack of Foundation		
117:15	118:10	106	118:11	118:12
121:4	121:8	Not Relevant		
149:1	149:25	Lack of foundation; leading; 106	148:16	148:25
150:1	150:24	Not Relevant; Outside the Scope; Lack of Foundation, Leading; 106	150:25	151:4
159:11	159:19	Leading		
160:6	160:20	Not relevant; lack of foundation; 403; outside scope of notice		
161:16	162:1	Not relevant; lack of foundation; 403; outside scope of notice		

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163:5	163:6	Not relevant; lack of foundation; 403; outside scope of notice		
165:1	165:9	Not relevant; 403		
165:10	165:25	Lack of foundation; 106	166:1	166:7

6. Jennifer Guerndt - 12/15/09

16:15	17:2	Lack of foundation		
36:24	38:19	Not relevant		
44:15	45:17	Lack of foundation; hearsay		
97:16	98:4	Lack of foundation; not relevant		
100:12	101:2	Lack of foundation; not relevant		
102:3	102:9	Lack of foundation; not relevant, 106		
127:5	127:11	Lack of foundation; not relevant		
148:4	149:9	Lack of foundation; not relevant		
157:6	158:2	Not relevant		
158:6	159:4	106	159:5	160:10
162:15	163:6	Not relevant; 403, prejudice and confusion of issues		
171:25	173:3	Not relevant; 403, prejudice, confusion of issues		
193:13	193:17			
202:21	205:14	Not relevant; 403, prejudice, confusion of issues; lack of foundation		

7. Dennis Jones – 9/16/09

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
10:4	10:13			
14:3	15:1			
16:20	17:6			
56:22	57:10	106	57:11	58:8

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8. Jason Lewandowski - 12/16/09

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
12:24	14:25	Not relevant		
19:6	19:24	106	19:25	20:3
19:25	20:2			
20:1	22:19	Not relevant; lack of foundation; 106	22:20	23:4
23:5	24:3	Lack of foundation		
24:4	25:9	Lack of foundation; not relevant		
25:17	25:23	Lack of foundation; not relevant		
26:13	27:10	Lack of Foundation		
28:2	28:23	Not relevant, lack of foundation, cumulative		
28:24	30:9	Not relevant; lack of foundation		
30:24	31:13	Not relevant; lack of foundation; Prejudicial – confuses the issues		
31:14	32:1	lack of foundation;		
34:9	34:12	Lack of foundation; not relevant		
34:21	35:14	Lack of foundation, not relevant		
42:24	45:11	Not relevant; 403 prejudicial, confuses the issues		

9. David Long - 7/9/09

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
51:15	53:20	106	74:4	88:20
60:19	61:3	Relevance; 403 prejudicial		
97:9	103:23	106	93:13	93:23
103:24	104:12	Not relevant		
106:15	107:5	Relevance		
141:18	143:25	106	144:1	147:5
155:20	158:13	Lack of foundation; leading		
166:20	174:10	Not relevant; 403		

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180:22	181:2	Not relevant; 403		
197:17	197:25	Lack of foundation; not relevant		
199:5	200:10	Lack of foundation; not relevant		
200:18	201:18	Lack of foundation; not relevant		
201:24	201:25			
206:24	208:7	403, cumulative		
227:16	231:19	Not relevant		
231:20	233:5	Lack of foundation		
241:2	241:11	Not relevant		
245:13	247:6	403		
275:3	275:10	Lack of foundation		
275:22	276:6	Leading		
276:7	278:12	Not relevant; leading; lack of foundation		
287:22	288:1	403, waste of time, cumulative		
290:5	290:18	Leading; 403		
292:9	292:14	Lack of foundation; leading		
292:16	293:18	Lack of foundation; leading		
294:17	294:20	403		
296:7	296:16	403		
300:18	301:7	Lack of foundation; not relevant; 403		
301:20	303:14	Not relevant; lack of foundation; leading; 403		

10. Thomas Marks - 6/18/08

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
11:2	11:5	Hearsay		
11:21	12:4	Not relevant		
10:1	12:4	106	12:5	12:16
15:7	15:22	Lack of foundation		
28:7	28:15	Lack of foundation		
33:5	33:10	Calls for legal conclusion		
33:19	33:22	Lack of foundation; calls for speculation; not relevant		
33:25	34:5	Lack of foundation; calls for speculation; not	34:6	34:8

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		relevant; 106		
46:6	46:15	Lack of foundation; calls for speculation		
51:13	51:22	Lack of Foundation; calls for speculation		
55:24	56:9	Not relevant		
60:8	60:25	Not relevant; calls for legal conclusion		
64:12	64:17	Lack of foundation		
67:2	68:1	Lack of foundation		
69:15	69:20	Lack of foundation; not relevant		
70:22	71:2	Lack of foundation; not relevant		
78:23	79:2	Lack of foundation; not relevant		
79:23	80:6	Lack of foundation; not relevant		
87:5	89:24	106	75:6	75:20
			76:3	76:6
			76:13	77:1
93:10	93:22	106	76:3	76:6
95:1	96:6	Lack of foundation; not relevant; 106	75:6	75:20
			76:3	76:6
112:22	113:8	Lack of foundation; not relevant; 403, confusion of the issues; outside the scope		
113:21	114:4	Lack of foundation; not relevant; 403, confusion of the issues; outside the scope		
124:22	125:12	Not relevant; 403, confusion of the issues; outside the scope; 106	125:24	126:7

11. Doug Mayer - 7/24/09

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
15:19	16:1			
48:5	48:9			
48:10	50:12	Hearsay; 403; not relevant; non-responsive; 106	50:16	52:11
53:5	53:19	; 106	53:20	54:7
58:10	58:24	; 106	59:1	59:14
115:17	116:17	Hearsay		
118:12	118:21	Non-responsive		

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121:23	122:22	106	130:12	133:13
			135:23	136:19
138:18	142:21	106	147:5	147:10
150:8	151:19	Non-responsive; 403, undue prejudice		
153:14	153:19	106	170:2	171:12
158:21	159:16	106	158:10	158:20
159:21	160:9	106	160:10	160:14
			162:2	162:17
			168:23	169:4
171:21	173:19	Hearsay		
235:1	235:20	Lack of foundation		
240:3	240:12	Not relevant; 403		
241:3	242:21	Lack of foundation; hearsay		
246:9	248:8	Not relevant; 403;		
249:9	249:24	Lack of foundation; calls for speculation		
250:1	250:16	Lack of foundation; not relevant;		

12. Howard Pace - 1/13/10

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
14:17	16:6	Not relevant		
18:3	18:17	Not relevant; lack of foundation		
18:24	20:14	Not relevant; lack of foundation; leading		
20:17	24:1	Not relevant; leading; lack of foundation		
33:2	34:9	Not relevant; lack of foundation		
36:24	38:6	Lack of foundation; not relevant		
38:7	39:14	Lack of foundation; not relevant		
40:1	40:8	Not relevant; leading		
40:22	41:3	Not relevant; lack of foundation		
44:10	44:13	Not relevant		
46:9	46:19	Not relevant; lack of foundation		
60:14	66:3	403, prejudicial, misleading, confuses the issues	122:14	123:11
66:12	70:15	Relevance		

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78:24	80:11	Not relevant; lack of foundation		
80:14	80:16	Not relevant		

13. Michael Schiller - 9/17/09

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
16:8	16:18			
16:19	18:3	106	18:18	19:6
20:13	20:21	106	20:22	21:6
40:9	41:7	106	40:7	40:8
42:11	44:5	Hearsay [43:19-22]; 106	44:6	45:15
52:14	52:17	Leading		
52:18	52:25	106	50:16	50:24
53:16	54:2	Leading [53:20]		
54:11	55:5	106	55:12	58:7
61:24	62:1	106	62:2	62:18
62:19	63:6	106	63:7	63:19
66:5	66:14			
67:23	68:19	106	68:20	69:3
69:4	70:19	106	70:20	74:12
71:15	71:23	106	71:24	74:12
72:15	72:18	106	72:19	74:12
72:24	73:4	106	73:5	74:12

14. Joshua Simes – 9/15/09

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
40:15	40:19	106	39:12	41:5

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15. Jim Vercruyssen - 1/11/10

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
12:3	12:9		12:10	12:14
13:7	14:9		14:10	14:22
24:10	25:5		25:6	25:13
25:17	26:25		27:1	28:4
30:12	30:15		29:9	30:11
35:22	36:20	Hearsay [36:4]		
36:17	36:22	Speculation; lack of foundation; hearsay [36:20-36:22]		
38:23	39:12	Leading [38:23; 39:8]		
46:21	47:7		47:8	47:11
48:2	49:25		50:1	50:16
			51:4	51:19
57:3	59:15		59:16	60:18
60:19	61:24		61:25	62:10
62:11	62:25		63:1	63:6
64:13	64:14	Leading		
65:17	65:19	Leading		
65:21		Leading		
65:22	66:12	Leading [66:9-66:11], Lack of foundation		
66:24	67:7		67:8	67:23
67:24	68:1	Lack of foundation; speculation		
68:9	68:12	Lack of foundation; speculation		
69:20	69:21	Lack of foundation; speculation; hearsay		
69:23	69:24	Leading; speculation		
70:2	70:3	Leading; speculation; non-responsive answer [70:18-70:19]		
70:22	71:1	Lack of foundation; leading; speculation		
71:3	71:12	(previously designated objection stands)		
71:15	71:23	Improper lay witness opinion [71:23]		
71:25	72:7	Improper lay witness opinion		
72:13	72:16	Lack of foundation; speculation; leading		
72:18	72:19	Move to strike as non-responsive		
73:24	74:3	Move to strike as non-responsive		
74:14	75:12	Leading; speculation; irrelevant [74:14-74:15]		
75:9	75:16	Lack of foundation; speculation; leading		
75:15	75:22		75:23	76:6
			76:11	76:20
77:1	77:2	Leading; vague; speculation		

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77:9	77:10	Leading		
77:16	77:17	Leading; irrelevant		
90:7	93:2		93:3	93:10
95:6	95:12		95:13	95:15
109:22	109:24	Leading; speculation		
110:17	110:19		110:20	111:16
112:14	112:25		113:1	113:7

16. Scott Zuelke - 10/21/09

NPI Designation		GJ Objections	GJ Counter-Designations	
Start	End		Start	End
23:10	43:6	Not relevant; lack of foundation; 403, prejudicial, misleading, confuses the issues; hearsay		
43:15	43:20	Not relevant		
45:21	48:20	Not relevant; 403, prejudicial, misleading, confuses the issues; hearsay		
48:24	51:6	Not relevant; lack of foundation; 403, prejudicial, misleading, confuses the issues; hearsay		
51:10	53:14	Not relevant; 403, prejudicial, misleading, confuses the issues		
53:16	56:15	Not relevant; lack of foundation; 403, prejudicial, misleading, confuses the issues; hearsay		
59:5	61:21	Not relevant; 403, prejudicial, misleading, confuses the issues		
63:15	64:14	Not relevant		
65:15	67:18	Not relevant; form of question, mischaracterizes the document		
68:4	68:10	Not relevant, prejudicial, confuses the issues		
68:21	72:11	Not relevant; 403, prejudicial, misleading, confuses the issues		
75:3	77:9	Not relevant; lack of foundation		
77:25	78:24	Not relevant; lack of foundation		
80:9	81:4	Not relevant		
81:8	81:15	Not relevant; lack of foundation		

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84:15	87:21	Not relevant; 403, prejudicial, misleading, confuses the issues		
88:23	91:15	Not relevant		
94:1	97:16	Not relevant; lack of foundation		
98:1	101:7	Not relevant; lack of foundation		
111:10	112:17	Not relevant		
113:22	115:21	Form of question		
119:10	122:13	Form of question; relevance		
123:2	124:23	Not relevant; 403, prejudicial, misleading, confuses the issues		
125:16	131:5	Not relevant; 403, prejudicial, misleading, confuses the issues; lack of foundation		
131:9	132:10	Not relevant; lack of foundation		
133:10	134:12	Not relevant; lack of foundation		
135:17	136:10	Not relevant; lack of foundation		
136:12	137:9	Not relevant		
139:11	143:2	Not relevant; form of question		
145:7	147:14	Not relevant, lacks foundation; form of question, mischaracterizes witness' testimony		
149:10	151:6	Not relevant; 403, prejudicial, misleading, confuses the issues; lack of foundation		
151:8	153:7	Not relevant; lack of foundation		
153:9	154:12	Not relevant		
154:14	156:25	Not relevant; 403, prejudicial, misleading, confuses the issues; lack of foundation		
158:1	158:16	Not relevant; 403, prejudicial, misleading, confuses the issues; lack of foundation		
159:18	162:4	Not relevant; 403, prejudicial, misleading, confuses the issues; lack of foundation		
164:10	167:16	Not relevant; 403, prejudicial, misleading, confuses the issues; lack of foundation		
167:18	167:25	Not relevant		
168:21	169:4	Not relevant		
169:17	170:25	Not relevant; lack of foundation		
172:23	173:12	Lack of foundation		
175:23	195:7	Not relevant; 403, prejudicial, misleading, confuses the issues; lack of foundation; form of		

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		question		
195:18	198:9	Not relevant; 403, prejudicial, misleading, confuses the issues; lack of foundation; form of question		
198:23	199:16	Not relevant		